

7014 '99 JUL 15 P2:19

July 13, 1999

William Hubbard
Food and Drug Administration
Dockets Management Branch (HFA-305)
5630 Fishers Lane, Room 1061
Rockville MD 20852

Re: Docket No. 98N-1038,
"Irradiation in the Production, Processing, and Handling of Food"

To whom it may concern:

I am extremely concerned about the prospect of weakening the labeling requirements for irradiated food. Any foods, or any foods containing ingredients that have been treated by irradiation, should be clearly labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the radura, the international symbol of irradiated food. If the food is not packaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale.

Like other labels required by federal law, irradiation labels must be truthful and not misleading. Proposals to use euphemistic phrases like "cold pasteurization" are inappropriate because pasteurization is an entirely different process of rapid heating and cooling. The terms "treated with radiation" or "treated by irradiation" should be retained because they accurately portray the irradiation process. The radura symbol, without written disclosure, is not adequate.

Food treated with radiation must continue to be clearly labeled with the radura symbol and a statement indicating it was treated with radiation. The absence of such a statement would be misleading because irradiation destroys vitamins and causes changes in sensory and spoilage qualities that are not obvious or expected by the consumer. Consumers have a right to know how their food has been processed. Please ensure that labeling requirements are strengthened, not weakened. Personally, I oppose food irradiation and will refuse to buy any irradiated food.

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Additionally, irradiation creates a new class of unique radiolytic products (URP) that have never been tested for the possible carcinogenic effects on humans. The irradiation process, also, creates new volumes of radioactive waste from Cobalt-60 and Cesium-137 which will plague our nation; exposing workers to toxic radionuclides when we haven't a clue as to what to do with the nuclear waste we already have.

Sincerely,

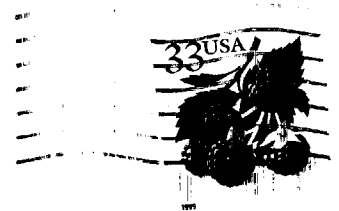
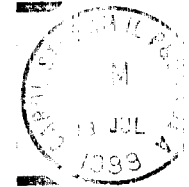
A handwritten signature in cursive script that reads "Robert F. Moriarty". The signature is written in black ink and is positioned above the printed name.

Robert F. Moriarty

510 Western Street

Hoffman Estates, IL 60194-3023

Bob Moriarty
510 Western Street
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